



September 20, 2016

In the Matter of

Inquiry Concerning the Deployment of Advanced
Telecommunications Capability to All Americans
In a Reasonable and Timely Fashion, and Possible
Steps to Accelerate Such Deployment Pursuant to
Section 706 of the Telecommunications Act of
1996, as Amended by the Broadband Data
Improvement Act

GN Docket No. 16-245

The Power & Communication Contractors Association (PCCA) represents construction contractors, manufacturers, and suppliers that build and repair America's power and communications infrastructure, including electric transmission, distribution, and substation facilities and broadband, telephone, and cable television systems. PCCA members also engage in directional drilling, local area and premises wiring, and improvements to water and sewer infrastructure, as well as gas and oil pipelines. PCCA appreciates the opportunity to comment on the FCC's Broadband Notice of Inquiry (NOI), released on August 4, 2016. The NOI seeks public input to help assess "whether advanced telecommunications capability is being deployed to all Americans in a reasonable and timely fashion."

While federal and state policies and programs have enabled a high percentage of telephone service deployment across the United States, rural areas, where the capital costs of communications networks are compounded by the distances their facilities must cover, face challenges relating to divergent terrain and other geographic concerns. Cost recovery can also be problematic because of fewer users compared to municipalities and other urban areas. All of these factors lead to inherently higher costs than those in urban areas.

Evolving Speed Benchmarks

PCCA applauds FCC efforts to expand broadband access to more rural areas by modernizing and reforming the Universal Service Fund (USF) program, which supports small rural carriers. Provisions for using USF funds to help carriers offer stand-alone broadband service to more rural customers and to encourage carriers to invest in underserved communities have taken needed steps to provide broadband service in underserved areas. However, much more needs to be done.

The NOI seeks comment on "the appropriate criteria and benchmarks by which to measure whether fixed and mobile broadband services provide access to update our existing 25 Mbps download/3 Mbps upload speed benchmark for fixed advanced broadband services and, if so, what that speed benchmark should be." PCCA believes that while this is a significant improvement to the previous outdated level of

10 Mbps downstream/1 Mbps upstream, even the 25 Mbps downstream/3 Mbps upstream target speed sets a substandard bar in terms of potential performance. Given the historical and expected direction broadband speeds are heading, consumers will likely demand faster upstream and downstream speeds sooner rather than later. The 25/3 level should be considered the *minimum* speed provided, and the FCC should encourage innovation and target speed levels that will keep pace with evolving speed standards over time to meet the rising demand for high-speed, high-performance broadband service.

Addressing Agricultural Needs

PCCA members build broadband infrastructure in all parts of rural America, including the nation's croplands. Today's farmers are incentivized to operate in an efficient, economical, and environmentally responsible environment. American agricultural producers are currently producing more food and fuel with fewer resources and more regulatory requirements. They are able to do this because of new and improved technology-equipped machines but are hindered by inadequate access to broadband service.

The agricultural sector is highly interested in expediting the deployment of mobile broadband services to farms and croplands. Wireless service is necessary for farmers and ranchers who use precision agricultural equipment and allows farmers and ranchers to share information and data in real-time, minimizing the amount of necessary seed, fertilizer, pesticides, and other resources to reduce costs for fuel, labor, and water. However, ensuring the wireless service needed requires more fiber in the ground to deliver it.

As a member of the Agricultural Broadband Coalition (ABC), PCCA was pleased to see a bipartisan letter to FCC Chairman Wheeler by U.S. Senators Roger Wicker (R-MS) and Joe Manchin (D-WV) and a group of 24 other senators representing rural states with significant agriculture activity. The letter supports the need to assess cropland access to broadband service, stating that "[c]roplands and ranch lands have lagged behind in adequate mobile coverage, even as demand for coverage has grown. To address this gap, we urge you to consider a metric of broadband access in croplands (and farm buildings), in addition to road miles, to identify these areas of greatest need."

As PCCA members continue to build the infrastructure necessary to deploy broadband service to rural America, we agree with our partners of the ABC that the unique needs of American farm and ranch lands must not be neglected. We are available to the FCC as a resource in future efforts to make the most of federal resources aimed at expanding broadband accessibility in underserved areas of the country. We thank you for your consideration.